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VIA ECF

Honorable Philip M. Halpern
Hon. Charles L. Brieant Jr. Federal
Building & Courthouse
300 Quarropas Street
Room 530
White Plains, New York 10601

Re:

Application granted.

Plaintiff's time to serve the response to the Rule 56.1 Statement is extended to January 18, 2023. The format of Plaintiff's response to the Rule 56.1 Statement shall comply with Rule 4(E)(iv) of this Court's Individual Practices.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
January 4, 2023

Dear Judge Halpern:

As you are aware, I represent plaintiff Mr. James Grimm in the above-referenced action. At the present time, the deadline for plaintiff to serve his reply to defendants' Rule 56.1 Statement is January 11th.

Pursuant to Rule 1(C) of Your Honor's Individual Rules of Practice, for the reasons set forth below, on behalf of plaintiff, and with the consent of defense counsel, I ask that Your Honor extend the time for plaintiff to serve his response/ reply (the "Reply") to defendants' Rule 56.1 Statement (and accompanying exhibits) for an additional week to on or by January 18th.

As I explained to defense counsel, I was away last week on vacation, and also had to contend with a couple of health issues. Moreover, defendants' Rule 56.1 Statement contains 205 statements of alleged undisputed facts and is thirty-five (35) pages long,¹ and the additional time would provide the undersigned to adequately Reply to the Statement.

For these reasons, I ask that the Court grant plaintiff's request for one week extension until January 18, 2023, to serve his Reply to defendants' Rule 56.1 Statement. This is the first (1st) time any party has requested an extension of the summary judgment deadlines.

Thank you for Your Honor's consideration of this matter.

Respectfully Submitted,

By: /s/ Jimmy M. Santos
Jimmy M. Santos, Esq. (JS-0947)

cc: Joseph A. Saccomano, Esq. (via ECF)
Caterina Catalano, Esq. (via ECF)

¹ Defendants' request, to which I consented, to allow that additional pages beyond the normal 25 pages was granted by Your Honor. (Doc ## 30 & 31)